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Attorneys for PLAINTIFFS VALENTIN BEIANU, TRUSTEE,
VIORICA MARA REVOCABLE TRUST OF 2007, and
VALENTIN BEIANU

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

VALENTIN BEIANU, TRUSTEE,
VIORICA MARA REVOCABLE
TRUST OF 2007, a trust, and
VALENTIN BEIANU, an individual,

Plaintiffs,

vs.

FINANCIAL FREEDOM
ACQUISITION, LLC, a Delaware
limited liability company,
MTC FINANCIAL, INC. DBA
TRUSTEE CORPS, a suspended
California corporation,
GERALD DALTON, an individual, and
DOES 1 to 10, inclusive,

Defendants

Case No.: 2:11-cv-1761-PSG (JCGx)

**[PROPOSED] ORDER RE:
STIPULATION OF PLAINTIFFS
AND DEFENDANT MTC FINANCIAL
INC. DBA TRUSTEE CORPS TO
REMAND TO STATE COURT**

On March 1, 2011, Defendant MTC FINANCIAL INC. DBA TRUSTEE
CORPS filed a Notice of Removal of Action in this case;

Co-defendant Gerald Dalton is an individual who is a resident of California,
who was served in the State Court Action the same day as the stipulating Defendant;

WHEREAS 28 USC 1441(b) provides, in sum, that inclusion of an individual
resident of California is grounds for granting a Motion for Remand;

[PROPOSED ORDER]

1 The parties to the stipulation have met and conferred pursuant to Local Rule
2 7-3, and resolved their differences of opinion by agreeing to the executed
3 stipulation;
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5 Plaintiffs and the removing Defendant, MTC FINANCIAL INC. DBA
6 TRUSTEE CORPS, have stipulated that this case be remanded back to the state
7 court, Los Angeles County Superior Court, Case Number BC455969.
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9 GOOD CAUSE APPEARING THEREFORE, IT IS SO ORDERED.
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11 Plaintiffs are to give notice of this order.
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13 Dated: 03/14/11
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PHILIP S. GUTIERREZ

HON. PHILIP S. GUTIERREZ
U.S. DISTRICT COURT JUDGE
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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES:

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action. My business address is 41955 Fourth Street, Ste. 310, Temecula, CA 92590

On March 11, 2011, I served the foregoing document, described as: **[PROPOSED] ORDER RE STIPULATION OF PLAINTIFFS AND DEFENDANT MTC FINANCIAL INC. DBA TRUSTEE CORPS TO REMAND TO STATE COURT**

on the interested parties in this action as follows:

Fabio R. Cabezas, Turner, Reynolds, Greco & O'Hara via court electronic service system

Kevin Snyder, Dykema Gossett, by fax and mail, 333 S. Grand Avenue, Ste. #2100, Los Angeles, CA 90071 fax: 213 457-1850

Gerald Dalton, by mail, 280 S. Beverly Drive, Beverly Hills, CA 90212

☐ (BY MAIL) (As noted on the Service List) I am "readily familiar" with this firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. postal service on that same day with postage thereon fully prepaid at Los Angeles, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

☒ (BY FAX) I send such document(s) from facsimile machine (800) 704-4326 on the date above indicated using the facsimile numbers indicated by the respective party(ies)' address. I certify that said transmission was completed and that all pages were received and that a report was generated by said facsimile machine which confirms said transmission and receipt. I then mailed a copy thereof as indicated above.


☒ By electronic service using the Court's website, with a duplicate copy served by fax as stated above.

☐ (State) I declare that under penalty of perjury under the laws of the State of California that the above is true and correct.

☒ (Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

March 11, 2011.

Raymond G. Robinson
Type or Print Name



Signature